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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:

SEDGWICK, LLP,

Debtor.

Case No. 18-31087

Chapter 11

**DECLARATION OF JOHN W. LUCAS IN  
SUPPORT OF STIPULATION  
REGARDING AMENDMENT TO JOINT  
CHAPTER 11 PLAN IN RESOLUTION OF  
OBJECTION THERETO**

[Related to Docket No. 327]

I, John W. Lucas, declare as follows:

The following facts are personally known to me, and if called to do so, I could and would competently testify thereto.

1. I am a partner in the law firm of Pachulski Stang Ziehl & Jones LLP, counsel to the above-captioned Debtor, and I submit this declaration in support of the *Stipulation Regarding Amendment to Joint Chapter 11 Plan in Resolution of Objection Thereto* [Docket No. 327] (the “**Stipulation**”), pursuant to which the Debtor, Committee, and the Tanenbaum Group agreed to eliminate the California Code of Civil Procedure § 877.6 relief sought in the Plan and partner settlement thereunder.

2. Prior to filing of the Stipulation, on or about 9:32 p.m. (Pacific Time) on January 15, 2020, I sent an email to the forty-seven settling partners under the Plan and Settlement asking each of them whether or not they consent to the removal of the requested relief pursuant to California

1 Code of Civil Procedure § 877.6. I received written communications from all forty-seven partners  
2 affirmatively stating that they are agreement with the change.

3 3. In response, counsel to the Committee and myself prepared the Stipulation and  
4 confirmed with counsel to the Tanenbaum Group that I had obtained consent from the forty-seven  
5 partners before I filed the Stipulation.

6 4. I respectfully submit this declaration in response to the Court's order [Docket No.  
7 329] as I believe this declaration responds to the issue raised by the Court in the foregoing order.

8 I declare under penalty of perjury under the laws of California and of the United States that  
9 the foregoing is true and correct of my own personal knowledge. Executed this 16th day of January,  
10 2020, at San Francisco, California.

11 /s/ John W. Lucas

12 John W. Lucas